

UNITED STATES DISTRICT COURT

FOR MIDDLE DISTRICT OF PENNSYLVANIA

(8)

5-25-00
SC

FILED

HARRISBURG, PA

MAY 24 2000

IN THE MATTER OF

Russell, Neville M.

PETITIONER

MARY E. D'ANDREA, CLE
Per _____
Deputy Clerk

NO. 1:CV-00-0536

IN HABEAS CORPUS

28 USC. 2241, PETITION

Kane

PLS/LC Schimelpfenig

(PRO-SE)

Motion For Extension in Submission of Brief

Now Comes the Petitioner, Neville Russell, Pro-Se,
and Respectfully Request For an extension of
time for Submission of the Brief, in Support of
his Habens Corpus Petition & which is due by May
24, 2000.

This Extension is Necessary in Order to prepare
an Effective and Meaningful Rebuttal, Since
he is proceeding on pro-se basis and avers
in Support of his Claim thereof:

(1) The Time Set by the Court for the Submission
of his BRIEF is Too Short to get the job done.

(2) Petitioner's Respondent's Access to the Law Library is
Limited to three (3) hours a Week, Which is NOT

Sufficient time to conduct any meaningful research to prepare a good argument within this stipulated time.

The Service is aware of the problems pro-se litigants are encountering regarding their cases, Petitioner believes the Service will not be prejudiced in granting him the extension.

Wherefore, Petitioner prays that the Court grants him the extension he seeks.

Dated: May 21, 2000

Respectfully Submitted,
Neville M. Russell
Neville M. Russell.

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT of PENNSYLVANIA

NEVILLE RUSSELL,
PLAINTIFF,

PRO-SE

v.

AFFIRMATION OF SERVICE
IMMIGRATION & NATURALIZATION
SERVICE (ET-AL)

I Neville Russell Declare under the Penalty of Perjury, that i have on the 21st day of MAY, 2000 placed and submitted the within One (1) copy(ies) of the ^{attached} following moving papers, to be mailed through the institutional mailroom facility at York County Prison, Pennsylvania to the following parties:

~~The Clerk of the Court
U.S. District Court
Middle District of Pennsylvania
235 North Washington Avenue
Scranton, PA. 18501-1148~~

~~U.S. Attorney CLERK OF COURT
Middle District of Pennsylvania
228 Walnut Street
Harrisburg, PA. 17108~~

SUBMITTED BY,

Neville Russell

NEVILLE RUSSELL, (PRO-SE)

PETITIONER

York County Prison
York PA. 17402

Executed on the 21st day of MAY, 2000